

**Richards, Gabrielle D. (Gabby) (Perkins Coie)**

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**From:** Richards, Gabrielle D. (Gabby) (Perkins Coie)  
**Sent:** Tuesday, June 02, 2015 1:25 PM  
**To:** deesyfert@gmail.com  
**Subject:** RE: Can we work out a joint discovery plan

Ms. Subramanian,

Please let me know if you agree to the date below.

**Gabrielle D. Richards | Perkins Coie LLP**

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**From:** Richards, Gabrielle D. (Gabby) (Perkins Coie)  
**Sent:** Wednesday, May 27, 2015 1:16 PM  
**To:** 'Dee Syfert'  
**Subject:** RE: Can we work out a joint discovery plan

Ms. Subramaniam,

Thank you for your email. LNV will stipulate to an extension to **July 13, 2015** for the completion of discovery, filing of dispositive motions and filing of the joint alternate dispute resolution report. I believe this extension is fair and equitable to both parties, considering that the stay was put into place on March 12 and discovery was originally set to be complete on April 21. The deadline for LNV's response to your motion to dismiss would still be due on June 8.

Sincerely,

**Gabrielle D. Richards | Perkins Coie LLP**

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**From:** Dee Syfert [<mailto:deesyfert@gmail.com>]  
**Sent:** Wednesday, May 27, 2015 10:29 AM  
**To:** Richards, Gabrielle D. (Gabby) (Perkins Coie)  
**Subject:** Can we work out a joint discovery plan

Dear Ms. Richards,

I'd like to take this opportunity to apologize for my part of our past misunderstandings and suggest we start out anew with an respectful attitude moving forward with this case.

I wish to extend the discovery deadlines to reflect what we would have had if the need for a medical stay had not occurred. Please suggest or propose a fair joint discovery plan so we be prepared to file it as soon as the stay is lifted.

Sincerely,  
Denise Subramaniam  
971-275-7618